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August 18, 2021

**VIA ECF**

Judge Brian M. Cogan  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201  
Chambers: 718-613-2230  
Fax: 718-613-2236

Re: Allstate Insurance Company et al v. Epione Medical, P.C. et al;  
21-cv-03970 (BMC)

Your Honor:

I represent Defendants Epione Medical, P.C., Michael Y. Jacobi, D.O., Stella Raytsin, Elena Mumin-Akhunov, MBCC Support Ltd. D/B/A Billing Pros (hereinafter “Epione Defendants”). I write to request an extension of time for the Epione Defendants to answer or otherwise move until October 1, 2021, and further request an adjournment of the telephonic initial status conference (*ECF* #9), previously scheduled for August 26, 2021 at 10:00 am, to be adjourned until after October 1, 2021. Plaintiffs consent to both of our requests.

As relevant background, I was only recently retained on this matter and I entered an appearance on August 17, 2021. See *ECF* #10. I am requesting an adjournment because I have not yet had a full opportunity to discuss this case with all my clients and moreover I will be on vacation starting August 24, 2021, returning only after labor day. I have also had some preliminary discussions with Plaintiffs regarding settlement that I would like to try explore with the Epione Defendants and Plaintiffs before October 1, 2021.

The original dates for my clients answers are as follows:

- a) Michael Y. Jacobi, D.O. served on 7/30/2021, answer due 8/20/2021.
- b) Epione Medical, P.C. served on 7/29/2021, answer due 8/19/2021.
- c) Stella Raytsin served on 7/31/2021, answer due 8/23/2021.
- d) MBCC Support Ltd. d/b/a Billing Pros served on 7/29/2021, answer due 8/19/2021.
- e) Elena Mumin-Akhunov waiver executed on 8/17/2021, answer due 10/18/2021.

There have been no previous requests for an adjournment in this matter.

For the aforementioned reasons the Epione Defendants respectfully asks this court to extend the time for said Defendants to answer or otherwise move and for the Court to reschedule next week’s initial conference until after October 1, 2021.

Very truly yours,

/s/  
Abe George, Esq.

cc. **Via ECF**  
All Parties